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UNITED STATES DISTRICT COURT

FOR THE NORTHERN DISTRICT OF CALIFORNIA

M.H., a minor, through his Guardian Ad Litem,
 Michelle Henshaw, JOSEPH HARRISON, KRYSTLE
 HARRISON, MARTIN HARRISON, JR., and
 TIFFANY HARRISON, all Individually and as Co-
 Successors in Interest of Decedent MARTIN
 HARRISON,

Plaintiffs,

vs.

COUNTY OF ALAMEDA, a municipal corporation;
 SHERIFF GREGORY J. AHERN, in his individual and
 official capacities; DEPUTIES MATTHEW AHLF,
 ALEJANDRO VALVERDE, JOSHUA SWETNAM,
 ROBERTO MARTINEZ, ZACHARY LITVINCHUK,
 RYAN MADIGAN, MICHAEL BARENO,
 FERNANDO ROJAS-CASTANEDA, SHAWN
 SOBRERO, SOLOMON UNUBUN, and DOES 1-20,
 individually, jointly and severally,

Defendants.

Case No. C11-2868 CW (MEJ)

**STIPULATION AND ~~(PROPOSED)~~
 ORDER TO CONTINUE
 SETTLEMENT CONFERENCE**

1 ALL PARTIES, THROUGH THEIR RESPECTIVE COUNSEL OF RECORD, HEREBY
 2 STIPULATE, AND REQUEST THIS COURT TO ORDER, THAT the settlement conference
 3 currently scheduled before Magistrate James for April 3, 2012, be continued for approximately
 4 ninety (90) days for the following reasons:
 5

6 This is a complex wrongful death / civil rights case, that arose in the Alameda County Jail,
 7 with five Plaintiffs and 12 named Defendants. Defendants are deposing all Plaintiffs plus the
 8 decedent's former wife this week. Plaintiffs previously noticed, but had to continue, the depositions
 9 of all Defendant deputies due to missing documents. Defendants are in the process of locating
 10 additional responsive documents. The parties cannot be prepared to engage in meaningful
 11 settlement discussions by April 3, due to the complexity of this matter and the discovery likely to be
 12 completed by that time. However, the parties believe they will be prepared to evaluate this matter
 13 for settlement by July 3, 2012. Trial is scheduled for February 4, 2013.
 14

15 THEREFORE, THE PARTIES RESPECTFULLY REQUEST that this Court continue the
 16 current settlement conference to a later date no later than July 20, 2012.
 17

18 Dated: March 20, 2012

HADDAD & SHERWIN

19
 20 /s/ Michael J. Haddad

21 MICHAEL J. HADDAD

Attorneys for Plaintiffs

22 JOSEPH HARRISON, KRYSTLE HARRISON,

23 MARTIN HARRISON JR., and TIFFANY
 24 HARRISON

25 Dated: March 20, 2012

THE LAW OFFICES OF JOHN L. BURRIS

26
 27 /s/ Benjamin Nisenbaum *

28 BENJAMIN NISENBAUM

Attorneys for Plaintiff

M.H.

1
2 Dated: March 20, 2012

ANDRADA & ASSOCIATES

3
4 /s/ J. Randall Andrada *

J. RANDALL ANDRADA

Attorneys for Defendants

COUNTY OF ALAMEDA, GREGORY G. AHERN,
MATTHEW ALHF, ALEJANDRO VALVERDE,
JOSHUA SWETNAM, ROBERTO MARTINEZ,
ZACHARY LITVINCHUK, RYAN MADIGAN,
MICHAEL BARENO, FERNANDO ROJAS-
CASTANEDA, SHAWN SOBRERO, and
SOLOMON UNUBUN

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11 * Mr. Nisenbaum and Mr. Andrada provided their consent that this document be electronically filed.
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17 **ORDER**

18 PURSUANT TO STIPULATION, IT IS SO ORDERED. The settlement conference
19 scheduled for April 3, 2012, is hereby continued to a later date to be determined by the magistrate
20 judge, not later than July 20, 2012.
21
22

23 Dated: 3/22/2012



HONORABLE CLAUDIA WILKEN
United States District Judge